

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION

B.P., H.A., and S.H., )  
individually, and on behalf of )  
all others similarly )  
situated, )

Plaintiffs, )

v. )

No. 2:23-CV-00071  
TRM-JEM

City of Johnson City, )  
Tennessee, et al, )

Defendants. )

\* \* \* \* \*

VIDEO DEPOSITION OF SHANNON CASTILLO

August 9th, 2024

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

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JEFF RUSK COURT REPORTING & VIDEO

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1                   Q.           (BY MR. HERRIN) You indicated in  
2   one of your emails that we looked at that the tax  
3   value of the single fifth floor condo was 287,800.

4                               Do you recall that?

5                   A.           I do.

6                   Q.           And so are there public documents  
7   that show the tax appraised values of all three  
8   condos?

9                   A.           Yes.

10                  Q.           And so to make a -- considering the  
11   public information that's available, is it reckless  
12   to suggest that Cathy Ball's offer of \$416,000 was  
13   in some way a corrupt attempt on her part to  
14   purchase an \$800,000 piece of property from Sean  
15   Williams?

16                  A.           No.

17                               MS. KRAMER:  Objection.

18                  Q.           (BY MR. HERRIN) No?

19                  A.           It was not reckless.  That's what  
20   your question was.

21                  Q.           I'm saying is it reckless for  
22   somebody to suggest that --

23                  A.           Oh, that is reckless.  Yes.

24                  Q.           That the condo would be worth  
25   \$800,000 and that Cathy Ball was in some

1 conspiratorial way trying to purchase a half price  
2 condo from Sean Williams.

3 MS. KRAMER: Objection.

4 Q. (BY MR. HERRIN) Do you think that is a  
5 reckless undertaking to say that?

6 MS. KRAMER: Objection.

7 A. Yes, I think that's reckless. We  
8 have an appraisal that shows how much the property  
9 was worth.

10 Q. (BY MR. HERRIN) Would that be  
11 particularly true if the values for the three condos  
12 were known to be purchased around that value for  
13 three condos and just attribute it to the value of  
14 the one fifth-floor condo?

15 MS. KRAMER: Objection.

16 A. I don't know --

17 Q. (BY MR. HERRIN) Do you understand what  
18 I'm saying?

19 A. I don't know what you're saying.

20 Q. I'm sorry.

21 The three condos sold as a unit.

22 A. They sold -- yes, they sold  
23 together. Correct.

24 Q. And you -- are you aware -- do you  
25 have any information that the purchase price of all

1 three condos was around 800,000?

2 A. Yes, I am aware of that through the  
3 public documents.

4 Q. Okay. And would it be reckless for  
5 someone to see the purchase of three condos and then  
6 attribute to Cathy Ball's purchase of one condo for  
7 800,000?

8 A. Yes, that would be reckless.

9 MS. KRAMER: Objection.

10 Q. (BY MR. HERRIN) Okay. Would you  
11 request that -- would it be your request of the  
12 proceedings here today that your personal email or  
13 the personal email of Cathy Ball be redacted from  
14 the emails -- the text messages that you had with  
15 her?

16 A. I have no problem with that. That  
17 would be fine.

18 MS. KRAMER: Objection.

19 Can you restate the question?

20 Can you read it back.

21 COURT REPORTER: Did you request  
22 that -- would it be your request of the  
23 proceedings here today that your personal  
24 email or the personal email of Cathy Ball be  
25 redacted from the emails -- the text

1 messages that you had with her?

2 MS. KRAMER: Do you understand that  
3 question?

4 THE WITNESS: Yes, it's that -- my  
5 understanding is that he's asking that when  
6 this deposition is typed out that Cathy's  
7 personal email would be redacted. I have no  
8 problem with that being redacted.

9 Q. (BY MR. HERRIN) Your testimony, as I  
10 recall it, when you learned that Williams was a  
11 fugitive, I think you said you were shocked; is that  
12 right?

13 A. Yes. I had no idea.

14 Q. You had engaged with Sean Williams  
15 off and on for how many years?

16 A. Many.

17 Q. So during those many years, did you  
18 have information, meaning rumor, hearsay, gossip,  
19 that he was a rapist?

20 A. I did not.

21 Q. Okay. Did you learn of these  
22 allegations only after the arrest in North Carolina  
23 and in the newspaper or media coverage?

24 A. Yes.

25 Q. So fair to say that even though you

1 considered him to be squirrely --

2 A. Yes.

3 Q. -- you did not consider him to be a  
4 criminal.

5 A. No, not at that time.

6 Q. In your conversations with  
7 William's half sister, which I know was short, I  
8 think you said ten minutes on one occasion, I was a  
9 little bit unclear of exactly what happened there,  
10 but I think you were telling us that the sister was  
11 communicating to you that Williams was saying things  
12 that were, quote, "aren't reality."

13 Can you tell me what types of  
14 things she was referring to?

15 A. To the best of my recollection, it  
16 centered around somebody trying to take over control  
17 of his properties that were in his name and  
18 increased paranoia regarding that.

19 Q. And so in similar fashion to the  
20 conversation you had with Williams directly about  
21 statements he was making that you knew were not  
22 true, this was a similar confirmation of that with  
23 his sister?

24 A. Yes.

25 MS. KRAMER: Objection.

1                   Q.     (BY MR. HERRIN) You talked about police  
2     being involved in the Alunda Rutherford Register of  
3     Deeds Office.

4                             Was there any reference that these  
5     were Jonesborough police officers?

6                   A.     I do not know.

7                   Q.     Considering your contact with Sean  
8     Williams over whatever number of years it was as  
9     part of the downtown community, did you have any  
10    information that Sean Williams was a drug dealer or  
11    involved in drug trafficking?

12                  A.     I had no knowledge, nor -- of any  
13    of that. None at all.

14                  Q.     Do you have any information, again,  
15    over the same time period and the amount of time  
16    engaging with him in the downtown community, we'll  
17    call it, that he was involved in sex trafficking?

18                  A.     No.

19                  Q.     Child pornography?

20                  A.     No.

21                  Q.     Child pornography trafficking?

22                  A.     No.

23                  Q.     Any information that you gathered  
24    on the street that he was in a conspiratorial  
25    relationship with Johnson City Police officers,

1     paying police officers bribes, anything like that?

2                   A.           No.

3                   Q.           If you had even any information  
4     about that, is that the type of thing you would  
5     report to authorities who could do something about  
6     it?

7                   A.           Absolutely.

8                   Q.           If you had any notion of anything  
9     like that, would you have even attempted to put  
10    together a property transaction with Sean Williams?

11                  A.           Absolutely not.

12                  Q.           Prior to the issuance of your  
13    subpoena for your deposition here today, were you  
14    contacted by any of the plaintiffs' attorneys and  
15    them try to interview you over the telephone or  
16    otherwise?

17                  A.           Someone called me months before. I  
18    don't know which attorney it was or who that -- I  
19    don't believe it was either one of you -- to ask me  
20    about the condo. The nature of those questions were  
21    specific to -- erroneously, they asked me  
22    specifically if I represented Karl Turner or his  
23    wife in the purchase of that condo, which my answer  
24    was, "No, absolutely not." They said, "Did you know  
25    Karl Turner's wife?" I said, "No, I've never met



C E R T I F I C A T E

STATE OF TENNESSEE:

COUNTY OF KNOX:

I, Jeffrey D. Rusk, Registered Professional Reporter and Notary Public, do hereby certify that I reported in machine shorthand the foregoing proceedings; that the foregoing pages, inclusive, were prepared by me using computer-aided transcription and constitute a true and accurate record of said proceedings.

I further certify that I am not an attorney or relative of any attorney or counsel connected with the action, nor financially interested in the action.

Witness my hand and official seal  
this the 9th day of August, 2024.



Jeffrey D. Rusk, RPR, CLVS  
Notary Public at Large  
My Commission Expires: 4/29/2026  
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